

From: <bill.payne@srs.gov>
To: Gina Kirkland <KIRKLAGL@dhec.sc.gov>
CC: <dvernon.osteen@srs.gov>, "Hollis, Mark E" <Mark.Hollis1@duke-energy.com>
Date: 5/23/2011 10:25 AM
Subject: Re: Notice of Drafting for change to freshwater bacteria indicator
for recreational uses
Attachments: NOD for R.61-68 and R.61-69.pdf

Ms. Kirkland,

Savannah River Nuclear Solutions (SRNS) appreciates the proactive manner in which SCDHEC is proposing this regulatory change. By starting now, SCDHEC is providing adequate time for interactions with the regulated community. Please accept the following comments regarding the notice of drafting that proposes a change to the South Carolina freshwater bacteria indicator.

SRNS supports replacement of the existing freshwater bacteria indicator (fecal coliform) with E. coli if data indicates that such a change is appropriate. The statewide data collected by SCDHEC during 2009 tended to indicate that there was no significant statistical difference between the two species. If it would not be beneficial, then it would be illogical for certified laboratories and permitted facilities to expend the money necessary for the change. It would also cause confusion with regard to impaired water determinations and establishment of Total Maximum Daily Loads (TMDLs).

If data supports replacement of fecal coliform with E. coli as the freshwater indicator, then SRNS recommends establishment of a range of bacterial indicator standards based upon the frequency of use of a waterbody for full body contact recreation.

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